

Exhibit L

Bertha Elizabeth Skipton

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
MICHELLE YVETTE AMIN, et al.,

**AFFIDAVIT OF
BERTHA ELIZABETH
SKIPTON**

Plaintiffs,

20-CV-00412 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW JERSEY)
 : SS.:
COUNTY OF GLOUCESTER)

BERTHA ELIZABETH SKIPTON, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 34 Aspen Hill, Deptford, New Jersey 08096.

2. I am currently 84 years old, having been born on March 12, 1938.

3. I am the mother of Stephen E. Skipton, Sr., upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My son passed away from kidney cancer on August 23, 2014, at the age of 41. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. Stephen was a very active and healthy child growing up. When he was a kid, we loved going to the shore together and visiting the beach. We also enjoyed going on long rides in the car and taking trips to Pennsylvania. As Stephen grew older, we maintained a good relationship. Stephen ultimately moved to South Carolina, and I remained in New Jersey, so we didn't get to see each other as often as I would have liked. Still, we would constantly speak on

the phone and exchange emails. I loved when he'd send pictures of his kids.

6. My son was one of the first people who volunteered to help after the 9/11 attacks. Stephen did not like to talk much about his experiences and what he witnessed. However, I know that he was a part of the recovery effort when he was down there. He returned to the site for a few weeks following the attacks.

7. Stephen flew in from South Carolina to visit for Thanksgiving in November 2013. This coincided with the beginning of his illness. He expressed feeling severe pain in his kidney area and decided to cut the trip short to see a doctor. Along with his kidney pain, Stephen had also developed a cough that he could not shake. The doctors decided to run a plethora of tests to diagnose him. On April 1, 2014, Stephen called to tell me that the doctors had found lesions on his lungs. At first, I thought maybe he was pulling an April Fool's prank. Then, I realized that he was serious. Little did I know that it was the beginning of the end for him. I booked a flight and immediately flew down to see him.

8. Upon returning home from seeing Stephen after his diagnosis, I didn't stay in New Jersey long. I flew back to South Carolina shortly after that to be with him. I stayed with him until the end. I did all I could for my son. I was by his side at every doctor's appointment and medical treatment. I also stayed with him in the hospital. I was his emotional support and was there for him and his family in any way they needed me to be.


9. Witnessing firsthand what my baby went through was like having a piece of my heart cut out. Watching my son go from a strong man to a frail man seemingly overnight was terrible. All I could do was pray that he would beat his illness. He was much too young to die. It wasn't until his last couple of days that I realized he would not survive. Stephen's death has left a massive void at every family gathering and every one of his children's milestones. Having him miss his son's wedding was so sad. Knowing he is missing out on his future grandchildren's lives is even harder. Not a day goes by that I don't miss Stephen. No parent should have to bury their child.

10. My son will always be remembered for the many lives he touched. His legacy lives on through his children. It is heartbreaking seeing his kids grow without him. We all

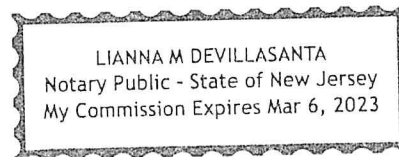
miss Stephen more than words can say.

Bertha Elizabeth Skipton
BERTHA ELIZABETH SKIPTON

Sworn to before me this
6 day of ~~June~~, 2022

July


Notary Public



Jennifer Skipton

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
MICHELLE YVETTE AMIN, et al

**AFFIDAVIT OF
JENNIFER SKIPTON**

Plaintiffs,

20-CV-00412 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF SOUTH CAROLINA)
 : SS.:
COUNTY OF BERKELEY)

JENNIFER SKIPTON, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 409 Whispering Breeze Lane, Summerville, SC 29486.
2. My current age is 46, having been born on August 24, 1975
3. I am the wife of Stephen E. Skipton Sr., upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.
4. My husband passed away from metastatic urothelial cancer on August 23, 2014. It was determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.
5. My marriage to Stephen was a great one. We had a very happy life together. We had twin daughters, and our family was our life. Stephen was a very active father who loved bike riding and traveling. Traveling was one of our favorite activities to do together. He was always finding fun activities for us to do. Stephen would take on extra jobs in order to support our family, but we would always coordinate days off during the week in order to have weekly

dates. He was truly my best friend. We did everything together. We would talk all day, every day.

6. My husband and I were not together in 2001. He never talked to me about his experiences on 9/11 until after he became sick. Even then, he didn't share much. He arrived at the World Trade Center site within 2-3 hours of the plane crashes. He went to work helping to coordinate the search and rescue at the communications center. He would continue to return to the WTC site in the same capacity for UMDNJ for another 2-3 weeks.

7. I was aware of Stephen falling ill immediately. He was the kind of person who was rarely ever sick. At first, we didn't think his illness was anything more than the flu. Stephen called me while he was at the firehouse one day and described that he felt like something had crawled into his lungs. We immediately scheduled a doctor's appointment. The doctor believed that Stephen simply had bronchitis and prescribed him antibiotics. The antibiotics did not help. The ineffectiveness of the antibiotics led the doctor to perform a CAT scan. The scan revealed legions on Stephen's lungs. A bronchoscopy was performed, and the doctor's diagnosis now changed to sarcoidosis. Stephen had immense pain in his hips and back which continued to progress. This pain led to a new diagnosis of cancer. The fine needle used to perform the bronchoscopy was unable to penetrate deep enough to reach the cancer which led to the misdiagnosis of sarcoidosis. It was discovered that Stephen's cancer was originally renal cancer that spread throughout his body. On May 29, 2014, he was diagnosed with Stage IV cancer.

8. Being there for my husband once he fell ill was my number one priority. Neither of us were able to work but, luckily, we had a lot of great family and friends to support us. I was by Stephen's side 24/7. I was there for him through every treatment and every procedure. Every planned and unplanned trip to the hospital. I helped him with all his basic essential functions. He didn't sleep much and was living in a constant state of fear and anxiety. I did my best to support him in every way he needed.

9. I was in denial when my husband first fell ill. I truly believed that I would be able to fix him and make him better. It was awful. Seeing my strong husband become a man who couldn't even go to the bathroom by himself was hard. Having our kids see him in his weakened state was hard. His illness put a strain on our marriage. We couldn't do the things we loved doing together and even our most intimate moments suffered and eventually ceased. The worst

part was seeing how scared and filled with anxiety he was. It all happened so fast that we didn't realize he was going to die until it was already too late. Since, my life has been entirely devoted to making sure our girls have everything they need. Doing this alone has been an extra unforeseen burden. I always thought I would have Stephen to help.

10. Stephen was the kind of man who was always trying to help everyone he could. Friends and family, everyone has a story about him. He is missed at every milestone. He missed his son's wedding. We just found out his son is having a baby who Stephen will never meet. He is missing major milestones. He will miss his daughters' graduation. He was such an involved and loving father that it makes things even more difficult. He is remembered by the community and his coworkers. He was funny and could talk to anyone. No matter who he met he found common ground and could talk to everyone. He had a promising career as a fireman. It was his passion. He was the love of my life. I am honored I was his wife. My girls are still in counseling trying to put together everything that happened. They're starting to understand at an adult level what happened, and, because of this, it is almost like they're back in the grieving process. Life without Stephen is hard.


JENNIFER SKIPTON

Sworn to before me this
30 day of June, 2022

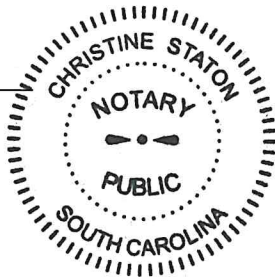
Christine Staton

Notary Public

Expires:

March 17 2030

Charleston County



Stephen E. Skipton Jr.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
MICHELLE YVETTE AMIN, et al.,

AFFIDAVIT OF
STEPHEN E. SKIPTON, JR.

Plaintiffs,

20-CV-00412 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW YORK)
 : SS.:
COUNTY OF NEW YORK)

STEPHEN E. SKIPTON, JR., being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 1205 Princess Road, Cherry Hill, New Jersey 08034.

2. I am currently 31 years old, having been born on April 27, 1991.

3. I am the son of Stephen E. Skipton, Sr., upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from metastatic urothelial cancer on August 23, 2014, at the age of 41. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. My father and I were very close. He was my best friend. While I was growing up, he and I enjoyed fishing, hunting, taking pictures of fire trucks, and buffing fires. He taught me everything he knew about firefighting and always hoped that I would follow in his footsteps, which I did. He was a hero to me, and I wanted to be just like him. Before he became ill, he drove me though the entire firefighting process, everywhere I had to go, including to an

interview in Charlotte, North Carolina. A month after my dad passed away, I found out that I got the job.

6. My dad didn't like to speak much about his experiences on 9/11 until after he became sick. I know that he arrived at the World Trade Center site within 2-3 hours of the plane crashes. He went to work helping to coordinate the search and rescue at the communications center. He would continue to return to the WTC site in the same capacity for UMDNJ for another 2-3 weeks.


7. My dad always kept himself in good shape. He and I would exercise together. He started experiencing hip pain, which was abnormal for him. He believed that maybe it was arthritic pain. When the pain persisted, he went to have it checked and learned that he had Stage IV cancer. I was completely devastated by the diagnosis.

8. His condition seemed to take a turn for the worse very quickly. Due to his chemo treatments, his physical degradation was almost immediate, which was hard for me to see. However, his mental degradation was the most heartbreaking for me. He was sad and sullen because he could no longer do the job that he loved. He also knew that he didn't have much time left, and he became somewhat fatalistic. It was less than a year between the time my father was diagnosed until his death. It's been 8 years and I have still not fully processed it. I never expected to lose my dad and best friend in his early 40's. I can't even describe what that did to me.

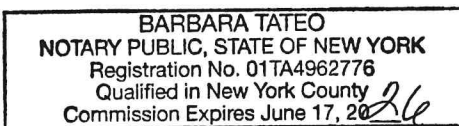
9. My dad worked as an EMT and had always dreamed of working for the Camden New Jersey Fire Department. He was well-respected within the Camden community. When I moved back to New Jersey after my dad passed away, I became a firefighter for the Camden Fire Department. I am living my father's dream. Unfortunately, he didn't live long enough to see me graduate from the Fire Academy. I know he would have been proud.

10. I miss my dad, and I know that there would have been so much more that we could have done together. It's sad that he'll never have the opportunity to meet his first granddaughter, who was born only yesterday. He would have been ecstatic and would have made a wonderful, loving grandfather. The loss of my dad has definitely had an impact on my

life. I still get choked up that he is no longer with us. I sometimes feel there's a missing piece to the puzzle.


STEPHEN E. SKIPTON JR.

Sworn to before me this
16th day of August, 2022


Notary Public

Dillon Andrew Smith

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
MICHELLE YVETTE AMIN, et al

AFFIDAVIT OF
DILLON ANDREW SMITH

Plaintiffs,

20-CV-00412 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF TENNESSEE)
 : SS.:
COUNTY OF HAMILTON)

DILLON ANDREW SMITH, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 6527 Oak Drive, Harrison, Tennessee 37341.
2. I am currently 32 years old, having been born on February 23, 1990.
3. I am the son of Michael Paul Smith, Jr., upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.
4. My father passed away from metastatic pancreatic cancer on December 25, 2015, at the age of 56. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.
5. I had a great relationship with my father. He was a mentor to me, and we did everything together. For example, we worked together to remodel every house we ever lived in. I remember taking many trips to Home Depot with him to get supplies. We also worked in construction together, and I look back fondly at driving to work with him every day. I loved working with him. When he transitioned into being a fire marshal at a nuclear power plant, I

followed him again and started work there as a union iron worker. People still talk about him fondly at work there. He was a great father, and my brother and I could depend on him for whatever we needed.

6. My father was a firefighter at the time of the September 11, 2001, terrorist attacks. He assisted in the search and recovery efforts starting from the day of the attacks and continued doing so in the months after. We rarely saw him during this time period, as he was constantly working in the World Trade Center area. He cared deeply about his fellow firefighters – they were his brothers.

7. I remember the day he sat my brother and me down to tell us about his illness. He said that a few weeks ago, he was not feeling well, so he went to the doctor for a checkup. After a few rounds of tests, he was diagnosed with cancer. He did not know many details at the time. It was a very straightforward way to share such news.

8. While my dad was sick with cancer, I would go and visit him every day after work. He was at home, and I would visit to spend time with him and help in any way I could. This was especially important in the final month or month and a half of his life. He had been a strong man, but his body deteriorated greatly with his illness. In his final 40 or so days, he could no longer walk. It was like he had become paralyzed. My brother and I would need to help him move just so he could use the bathroom. This was difficult since he was such a big man, and one time we dropped him and could not get him up. He started with home visits and assistance from a nurse and had a lift installed after this.

9. My father's illness was extremely stressful on me. I was a young man at the time in my 20s, and the stress of it all led me to drink more alcohol than I normally would. It was a very bad experience for me. This drinking continued after he died. I was engaged then, and this drinking problem led me to lose that relationship. I had to crawl myself out of the depression I was experiencing.

10. I still have dreams of my father, and it is never easy for me when I have those. I am also reminded of him constantly through different experiences. For example, I recently took my family to see a monster truck show. This reminded me again of my father because it was something he had done with my brother and me.

11. My father's passing has also negatively affected other members of our family. I worry about my mother a lot because she is now alone. My brother and I have children now too, and they will never get the chance to meet their grandfather. This is extremely unsettling to me. He was a great father who loved spending time with his children. He never missed a baseball game for my brother and me. He will never get these opportunities with his grandchildren.

12. My father's brother was also a firefighter. At the time of the attacks, I believe that the firefighters earned overtime to go down and assist with the search and recovery efforts at Ground Zero. My father used his brother's overtime hours for him so that his brother would not need to go to Ground Zero. His brother is still alive, and he probably is because my dad did this for him.

13. My father was the pillar of strength in our family. It was very difficult to see him deteriorate from the big, strong man that we knew, to someone who could not even walk. It was horrible and disturbing to watch. I miss him every day.



Sworn to before me this
20 day of July, 2022

Janet R. Young
Notary Public

Dillon Andrew Smith
DILLON ANDREW SMITH

Faith Ann Smith

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X

MICHELLE YVETTE AMIN, et al

**AFFIDAVIT OF
FAITH ANN SMITH**

Plaintiffs,

20-CV-00412 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF TENNESSEE)

: SS.:

COUNTY OF HAMILTON)

FAITH ANN SMITH, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 5822 Dogwood Drive, Harrison, Tennessee 37341.

2. I am currently 67 years old, having been born on July 20, 1954.

3. I am the wife of Michael Paul Smith, Jr., upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My husband passed away from metastatic pancreatic cancer on December 25, 2015, at the age of 56. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. I had a great relationship with my husband. We were together for over 30 years and had two sons together. He was a great father to our sons, and he also had a great relationship with my daughter from a previous marriage. We did everything together and as a family. For example, we enjoyed going to the movies, watching different shows together, going on walks, and going out on our boat.

6. My husband was a firefighter, just as his father was before him and his brother still is. He was off work the morning of the September 11, 2001, terrorist attacks, but he quickly went into the city that day to help with the search and recovery efforts at Ground Zero. He continued working there for months afterward, and he even volunteered to do other firefighters' shifts who had gotten sick or were too emotionally impacted to continue working there. Working at Ground Zero was something that he felt that he needed to do. He wanted to help find and identify any bodies in the rubble so that families who lost loved ones could have closure. His experience there was something he rarely discussed with our family, but I did hear stories where he described the terrible smell of the area and one instance of finding part of a woman's body in the debris. He even continued in the efforts by later volunteering at the Fresh Kills landfill.

7. Michael first became sick almost immediately after first going to Ground Zero. I asked him to come home after his first few days working there in order to comfort the boys, who were worried about him. At this point, he already was sneezing little sprays of blood and coughing up chunks of black stuff. It was horrible, and these respiratory symptoms would never go away, staying with him for over ten years until his eventual death from cancer.

8. These health issues quickly forced Michael to transition to a desk job at the fire department. And shortly thereafter, he was forced into retirement. This change had a negative impact on him, and he wanted to get away from New York. So, in 2004, on a fishing trip to Tennessee, he found a new home for our family. We started our move down there only a few weeks later.

9. Besides the nearly immediate health impact from his exposure at Ground Zero, there was also an emotional impact on Michael. His personality changed, and he was no longer the happy-go-lucky man that I knew. He began struggling with his emotions and with his attitude toward things in general. While I knew that I was not the cause of this change, Michael still did occasionally lash out at me verbally over small things he was unhappy with, such as what we were having for dinner or how it was cooked.

10. At the end of 2013 or early 2014, Michael became sick with what we initially thought was the flu. He went to his primary care doctor who prescribed some antibiotics, which seemed to work at first. However, this illness came back after a few weeks stronger than before. He went back to the doctor for more tests, and I told him to make sure he got a chest x-ray to

make sure it was not pneumonia. He returned for more scans the next week, and I told him not to return home unless he knew what was wrong. If he was sick, it would affect our whole family, not only him. He came back home with some papers and told me that, basically, he was dying of cancer. He would suffer with this cancer before passing away from it about two years later.

11. Michael had every test that he could, and he was eventually diagnosed with several cancers. These included kidney, pancreatic, liver, and esophageal cancer. The cancer eventually spread to his brain and bones as well. He was unfortunately loaded with cancer, and in the last month or so of his life, he could not even walk. My husband suffered greatly and was in so much pain. He had to take so many pills to try and treat this pain too, but they never truly worked. He continued to suffer even with medication.

12. I became Michael's full-time caregiver. I promised him I would never put him in a nursing home, and I never did. I brought him to all of his chemotherapy appointments except one. I later learned that he did not want me to go to this one appointment so that he could ask the doctor without me how much more time he had to live. I could not do everything at home myself though, so fortunately, my two sons would help me take care of him and move him around, since he was such a big man. I tried to have a strong appearance for my husband through this whole experience, even if I was worried and stressed on the inside. I do remember though that one time I broke down in front of him when I needed to try and change him, but he would not let me.

13. Michael's personality changed again after his cancer diagnosis and while sick. He became resigned to the situation. He would sleep all day and stay up all night. I could not sleep either because I was so worried about him at night. I still cannot sleep well. To me, it was like having to care for a disabled child that needed special medical care. The experience traumatized me, and I do not think I will ever be normal. To me, there are almost no words to describe it.

14. I am constantly reminded of my husband and what we went through. Around our house, there are still his shoes and the big chair he used to sit in. And while he was working at Ground Zero, I had given him a disposable camera to document his experience. I wanted to see what was going on there through his eyes, not just through the television or media. We developed these photos, and he decorated his garage bar and game room with many of them. I am also reminded of Michael when there are things around the house that need to get done. He used to take care of everything, such as the lawn. Now, I either need to hire someone or have one

of my sons come over and help me do it. Small things like this really impact you, the little things that make a marriage what it is.

15. My husband passed away on Christmas day, only about a month after his 56th birthday. He died in my arms. Our sons will never have a normal Christmas again, and our grandchildren will never have the opportunity to know their grandfather. 56 years old is too young to die, and I feel that we were robbed of my husband. The past six years feel like only six minutes to me. His death never leaves us, and this is why I am participating in this lawsuit. Someone should be held responsible for robbing my family and me of Michael, and of robbing me of my future happiness.



Sworn to before me this
19 day of July, 2022

Janet R. Young
Notary Public

Faith Ann Smith
FAITH ANN SMITH

Michael Paul Smith III

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
MICHELLE YVETTE AMIN, et al

**AFFIDAVIT OF
MICHAEL PAUL SMITH, III**

Plaintiffs,

20-CV-00412 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF TENNESSEE)
 : SS.:
COUNTY OF HAMILTON)

MICHAEL PAUL SMITH, III, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 6536 Oak Drive, Harrison, Tennessee 37341.

2. I am currently 34 years old, having been born on October 16, 1987.

3. I am the son of Michael Paul Smith, Jr., upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from metastatic pancreatic cancer on December 25, 2015, at the age of 56. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. I had a great relationship with my father. Whenever he was not working, we would do things together, and he would always make sure that we had the best of everything. He would always coach my brother and my baseball teams, and he would take me to the skate park, to see motocross, or to go fishing. I also got to go to the firehouse with him and see how much he loved his job. He was always there for other people and not for himself. I think that is why he

loved his job as a firefighter so much.

6. On the morning of the September 11, 2001, terrorist attacks, my father was not scheduled to work and was at home. I was in school at the time. It was a very difficult day for me because some of my classmates had parents pass away in the attacks. My mother came to pick my brother and me up from school so that we could say goodbye to my father before he went down to the city to start helping with the search and recovery efforts. In the months afterwards, he returned to the World Trade Center area to help out as much as he could. I remember he brought me to Ground Zero before I marched with him and other firefighters in the St. Patrick's Day parade. I saw the devastation there. It is something I will never forget.

7. My father hid some of his symptoms from us when he initially was becoming sick – he did not want us to see him suffering. But we could tell something was wrong, as he had been moved to a desk job with the fire department and was later forced into retirement. He took my brother and me out for a boat ride one day, and we thought that we were going fishing with him. He took this time to tell us that he had been diagnosed with cancer and that he was going to die.

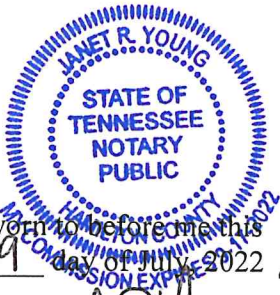
8. It was terrible seeing my father sick and watching his health decline. It was made worse too by the fact that we had moved to Tennessee and were far away from a lot of family in New York who would have been there for him. It is something you can never get over.

9. While my father was sick, I went to visit him every day at his home, which was about a 30-minute drive from where I lived. This was especially important in the final month or so of his life because his body had deteriorated to the point where he could barely walk. My brother and I needed to support him in doing his daily business, such as changing clothes. This was difficult for us, as my father was a big, strong man, and one time while we were moving him to the restroom, we dropped him and could not get him up. It was a hard experience for all of us – my brother and I felt like we were unable to help him. He was getting so sick, and it seemed like he was ashamed to have us around to help him. He did not want us to see him like that.

10. I moved to a new house down the street from my parents in order to be close to them while my father was sick. Unfortunately, by the time I found a house and moved in, he already passed away. The whole experience has really changed our lives, especially that of my mother who is now a widow. I visit her often and help her take care of things around the house. I

have seen her at her lowest points because of this.

11. Christmas is an especially difficult day for me now because it is the day my father passed away. I am now married and have a two-year-old daughter, and it is hard for my wife to understand why it is so hard for me to be joyful on that holiday. I miss my father every day, and I dream and think about him all the time.



Sworn to before me this
19 day of July, 2022

Janet R. Young
Notary Public

Michael Paul Smith III
MICHAEL PAUL SMITH, III

Morgan Leah Utzinger

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
MICHELLE YVETTE AMIN, et al.,

AFFIDAVIT OF
MORGAN LEAH UTZINGER

Plaintiffs,

20-CV-00412 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW YORK)

: SS.:

COUNTY OF WESTCHESTER)

MORGAN LEAH UTZINGER, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 102 Alkamont Avenue, Scarsdale, New York 10583.

2. I am currently 45 years old, having been born on June 25, 1977.

3. I am the daughter of Margaret Utzinger, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My mother passed away from chronic obstructive pulmonary disease and pulmonary fibrosis on August 23, 2018. It was medically determined that these illnesses were causally connected to her exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. My mom was always there for me. We always had a close relationship since I was a child. When I was in college, I would come home on the weekends to see my mom. I moved to New York after college and still made sure to see my mother weekly. She was very involved in my life and my children's lives. She even went as far as to move to New Rochelle in order to

help me with my children. After that move, I would see her daily. She would watch my kids for me, and we would have dinner weekly. She was close with my children and a big help getting them to and from school.

6. My mother was working for AIG in lower Manhattan at the time of the attacks on 9/11. The AIG building was located not too far from the World Trade Center site. She would spend the next two days in her office afraid to leave. She feared another attack. She would only leave her office building to buy fruit from a local vendor. She ate the fruit despite it being covered in dust. When she finally returned home, she was very relieved. It wasn't long after the attacks that she returned to work at the AIG office. She would continue working from that office until they moved their facilities to New Jersey.

7. She started having trouble breathing shortly after the events. One day, I came home to New Jersey to see my mother and she looked off color, blueish, and was not making sense. I took her to the hospital, and the doctors discovered she had low blood oxygen. That was the beginning. She never got off oxygen after that point. She had a lot of trouble getting around from there and began swelling often over time. It got harder and harder for her to breath over time.

8. I would take my mother to all her doctors' appointments and treatments. She had trouble walking and driving due to her struggles to breath. She required a lot of help but did not want to be a burden on anyone. I spent a lot of time cleaning up her house due to her inability to bend over. Eventually, she hired a maid, so I didn't have to clean up after her. I had to lower the stairs to my house as she struggled to get up them. She struggled to do a lot of physical activities. I would do any physical task for her that she could not perform. Occasionally, I would have to miss work to help care for her. I was in the hospital with her when she passed.

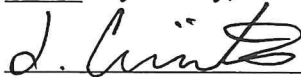
9. The emotional impact of my mother's illness on my life was huge. It was a really horrible thing to watch her go through. It was horrible seeing her lose her immense vibrance. She was always afraid of being unable to breath and that's what killed her. I will never be rid of the image of her passing away. I always want to talk to her and will never be able to again. It puts a strain on a lot of relationships in my life. It's something I think about every day. A great person was taken from the world, my family, and my kids. She will never be able to know her grandkids.

10. My mom was an environmentalist. She was a founder of the Hackensack River Coalition. She cared greatly about the environment and the people around her. She was a wonderful person. That was her greatest impact on the world.



MORGAN LEAH UTZINGER

Sworn to before me this
14th day of July, 2022



Notary Public

LAUREN MICHELLE CIRRITO
Notary Public, State of New York
Reg. No. 02CI6397041
Qualified in Suffolk County
Commission Expires August 26, 2023

Ephraim Vashovsky

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
MICHELLE YVETTE AMIN, et al.,

**AFFIDAVIT OF
EPHRAIM VASHOVSKY**

Plaintiffs,

20-CV-00412 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW YORK)
 : SS.:
COUNTY OF KINGS)

EPHRAIM VASHOVSKY, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 1461 E. 17th Street, Brooklyn New York 11230.

2. I am currently 54 years old, having been born on December 29, 1967.

3. I am the son of Sam Vashovsky, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from brain cancer on November 15, 2013. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. My father and I had a very good relationship. I definitely miss him greatly, and I think about him all the time. I talked to him a lot, and we played sports together. He was very involved in my life. He enjoyed spending time with my children, and we would often go over to

each other's houses for family dinners. We had a very strong relationship. I hope that as adults, my children can have the same relationship with me that I had with my father.

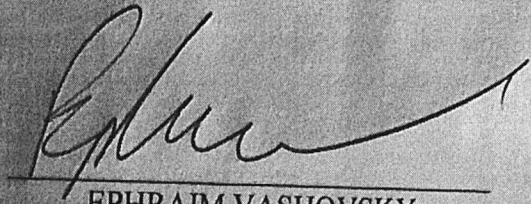
6. My father lived in an apartment building right in Battery Park, across the street from the World Trade Center. On 9/11, he and my mother were in their apartment when the attacks began. I was already married at the time and was not living in Manhattan. My parents were always talking about Ground Zero—the smoke, the exposure, and the attacks. They once brought my children down to Ground Zero to show them where everything happened. It was always on their minds. They moved a few years after 2001 to Midtown, and they continued to live in Manhattan.

7. My father's illness progressed in stages. It didn't happen in one shot. His condition started to deteriorate two to three years before he died. It probably started getting bad around 2009. He started to forget things. I try to remember him positively, and I don't want to think too hard about the ways he suffered. I like to think of him in good ways. But he was forgetting a lot, at work and at home. He was working, and it was approaching his time to retire, but he started having bad memory problems. He wanted to keep working but my mother was pushing him to retire. That's when I realized something was really wrong. It was more mental, at first, but in the end, he was in a wheelchair.

8. We brought him to Memorial Sloan Kettering, where he was diagnosed with brain cancer. He was also treated at NYU Langone with chemotherapy and radiation. He had brain surgery to remove the tumor, which we thought they had successfully removed. I guess not. I was always taking care of him, staying with him in the hospital or at his house. I'd have him stay at my house when he could still make it there. We just spent as much time with him as possible, me, my brother, and my mother. I would take off from work to take him to all his doctors' appointments. My brother and I paid for his treatments and any extra medical expenses—whatever he needed, we would provide for him.

9. My father was my role model. Without him, my life is not the same. All his grandchildren miss him terribly, and I miss him. He was a very good person. It's not easy without him, that's for sure. He helped hundreds of people with their jobs and their families. That's just what he did. He had a great heart. He is missed by many people in our community.

He was a mentor and role model for so many.


EPHRAIM VASHOVSKY

Sworn to before me this
28 day of July, 2022


Notary Public

SDRA COHEN
NOTARY PUBLIC, State of New Jersey
No. 50165983
Qualified in Ocean County
Commission Expires July 21, 2026

Lana Vashovsky

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
MICHELLE YVETTE AMIN, et al.,

AFFIDAVIT OF
LANA VASHOVSKY

Plaintiffs,

20-CV-00412 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW YORK)
 : SS.:
COUNTY OF NEW YORK)

LANA VASHOVSKY, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 630 1st Avenue 4H, New York, New York 10016.

2. I am currently 75 years old, having been born on June 5, 1947.

3. I am the wife of Sam Vashovsky, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My husband passed away from brain cancer on November 15, 2013. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. Sam and I were married for forty-seven years. We had a great relationship. We were married on November 5, 1966. We had a beautiful wedding. We had two sons, Ephraim and Stanley. We lived in Eastern Europe. We were both teachers at a college. Sam was teaching physics. We went through legal immigration to come to America. We came to America and started to learn English. My husband taught technical engineering, and he worked as a director

of biomedical engineering at Bellevue Hospital. I also worked at Bellevue Hospital, as an addiction counselor. Sam and I raised our two children and put them on the right track. Now, our children are both married. My husband was a devoted spouse and great father. Sam had a job in Manhattan, so he sold our house in Brooklyn and moved to Battery Park City.

6. On September 11, 2001, Sam and I lived just two blocks from the World Trade Center, at 380 Rector Place Apt 4N. Before 9/11, my husband was happy to move there. It was a co-operative building, and we bought the apartment in July 2001. We had just finished moving in on September 10th, 2001. The moving truck had just left when the disaster started. It was terrifying being so close to the World Trade Center.

7. Life became extremely difficult after 9/11. It was hard to live in our apartment, which became filled with smoke and dust from the attacks. There was all this black dust in the house and on the balcony. Sam and I were caught in the dust cloud. Sam started to not feel well in the years after 9/11. He was having memory loss, which I thought maybe was age-related. In 2006, one of the doctors made the connection between Sam's condition and living near Ground Zero. They said, "You have to move from that place, it's affecting him." It was frustrating for me to see him not be well, because he had been such a healthy person for a long time. He was an athlete his whole life. He even participated in the Olympics in the 1960s.

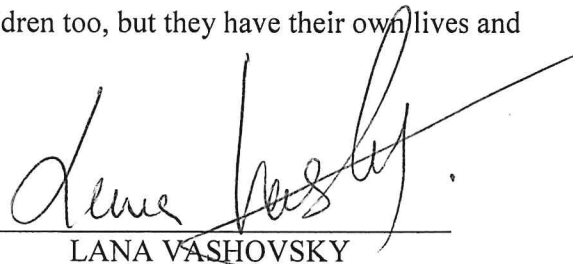
8. Sam's mental condition was deteriorating. He became confused. For a while before his mental state began to seriously decline, he was still working. He worked for a medical software company full-time. I had to take him to work in Midtown every morning because he couldn't find his way there. I had to beg him to retire, which he did in 2009. Sometimes, he would wander out of the house onto the street. I would have to call the police to help me find him. He was falling in the house, and sometimes he would hurt me by falling on me. It was hard for me to deal with. One time, the doorman in our building had to help me and Sam after he fell. The doorman told me, "Lana, you have to tell your children that your husband is not well. He needs to see a doctor."

9. In 2011, we took Sam to the doctor for an X-Ray, where he was diagnosed with brain cancer. They told me it was related to 9/11. I was shocked. I asked them how he could be sick all these years later. They said Sam had probably been declining for years, but because he was a strong person, he kept it together mentally for as long as he could.

10. I became Sam's primary caretaker, day and night. He began to suffer from incontinence and had to wear diapers, which I would change. He had a hard time making it to the bathroom. I had night nurses and other in-home health aides for Sam, which was very expensive. Some of them were not covered by his insurance, and my sons and I had to pay cash. Sometimes, the home aides showed up late or were negligent. He also had to be admitted to a nursing home for rehabilitation after his two brain tumor removal surgeries. The caretakers there were horrible. Once, I noticed that they wouldn't even give him a drink when he was thirsty. It was a difficult and emotional time. I was also taking care of my 95-year-old mother, who had dementia. We were very strained financially, as I had to pay for home care, taxis to doctors' appointments, and home medical equipment.

11. Life is very difficult after my husband's death. I live alone and never remarried. I have friends and my two sons, but I don't have a romantic relationship with anybody. My husband and I had so many happy times. People call me every year on Sam's birthday. We still always celebrate his birthday and our wedding anniversary. I try to memorialize him with pictures, and I even wrote a book of our memories.

12. Now, I am 75 years old. Life is very hard without him, and I need help sometimes. I have blood pressure issues and some other medical issues. I can't always keep up financially and sometimes I have to rely on my children. It's hard for me—people tell me to put away the pictures, because they make me sad. But I don't want to put away the pictures. I always talk to Sam. All that I had in life was just for him. I will always miss him. He was a very loved father and grandfather. It's difficult for my children too, but they have their own lives and have to move forward.


LANA VASHOVSKY

Sworn to before me this
14th day of July, 2022


Notary Public

